

February 1, 2002

Crompton Corporation
c/o Wendy Koch, Ph.D.
Epona Associates, LLC
156 River Road, Studio 3
Willington, CT 06279

Dear Dr. Koch:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for the Aluminum Alkyls category, posted on the ChemRTK Web Site on October 3, 2001. I commend the Aluminum Alkyls Consortium for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Chemical RTK HPV Challenge Program website EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA will post this letter and the attached Comments on the Chemical RTK web site within the next few days.

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit general questions about the HPV Challenge Program through the Chemical RTK web site comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

/s/

Oscar Hernandez, Director
Risk Assessment Division

Attachment

cc: W. Sanders
A. Abramson
C. Auer
M. E. Weber

EPA Comments on Chemical RTK HPV Challenge Submission: Aluminum Alkyls Category

SUMMARY OF EPA COMMENTS

The sponsor, The Aluminum Alkyls Consortium (ACC) submitted a Test Plan and Robust Summaries to EPA on August 23, 2001, for the Aluminum Alkyls Category. EPA posted the submission on the ChemRTK HPV Challenge Web site on October 3, 2001.

EPA has reviewed this submission and has reached the following conclusions:

1. Category Justification. EPA agrees that the grouping of the 24 members of the proposed category is appropriately based on structural similarities and chemical reactivity.
2. Physicochemical Data. EPA agrees with the Test Plan for these endpoints.
3. Environmental Fate, Health effects and Ecological effects. EPA agrees that, owing to the highly reactive nature of these chemicals when in contact with air or water, it is not feasible to perform environmental fate, mammalian or ecotoxicological tests on such a reactive category of chemicals.

EPA COMMENTS ON THE ALUMINUM ALKYLs CHALLENGE SUBMISSION

Category Definition

The category consists of a series of aluminum alkyls and chloroaluminum alkyls. The alkyl moieties differ only in length of the alkyl group.

Category Justification

The submitter justifies the grouping of the 24 members of the proposed category on the basis of similar molecular structures and the extreme reactivity of these compounds in the presence of air or water. EPA considers this approach reasonable.

Test Plan

Chemistry (melting point, boiling point, vapor pressure, water solubility, and partition coefficient)

The submitter's approach to these endpoints is acceptable for the purposes of the HPV Challenge Program.

Environmental Fate, Health effects and Ecological effects

EPA agrees that it is not possible to conduct any of the SIDS-level tests on these compounds.

Followup Activity

None